



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Investigation to Consider Policies to Achieve the Commission's Conservation Objectives for Class A Water Utilities.

Investigation 07-01-022
(Filed January 11, 2007)

In the Matter of the Application of Golden State Water Company (U 133 E) for Authority to Implement Changes in Ratesetting Mechanisms and Reallocation of Rates.

Application 06-09-006
(Filed September 6, 2006)

Application of California Water Service Company (U 60 W), a California Corporation, requesting an order from the California Public Utilities Commission Authorizing Applicant to Establish a Water Revenue Balancing Account, a Conservation Memorandum Account, and Implement Increasing Block Rates.

Application 06-10-026
(Filed October 23, 2006)

Application of Park Water Company (U 314 W) for Authority to Implement a Water Revenue Adjustment Mechanism, Increasing Block Rate Design and a Conservation Memorandum Account.

Application 06-11-009
(Filed November 20, 2006)

Application of Suburban Water Systems (U 339 W) for Authorization to Implement a Low Income Assistance Program, an Increasing Block Rate Design, and a Water Revenue Adjustment Mechanism.

Application 06-11-010
(Filed November 22, 2006)

Application of San Jose Water Company (U 168 W) for an Order Approving its Proposal to Implement the Objectives of the Water Action Plan.

Application 07-03-019
(Filed March 19, 2007)

**REPLY COMMENTS OF PARK WATER COMPANY ON PROPOSED
DECISION IN PHASE 1A**

LEIGH K. JORDAN,
Executive Vice President
Park Water Company
9750 Washburn Road
Downey, CA 90241
Phone: (562) 923-0711
Fax: (562) 861-5902
leigh@parkwater.com

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REPLY COMMENTS OF PARK WATER COMPANY ON PROPOSED DECISION IN PHASE 1A

In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure, Park Water Company ("Park") respectfully submits its reply comments on the Proposed Decision ("PD") of Administrative Law Judge Janice Grau on I.07-01-22, which was released for comment on January 15, 2008.

I. INTRODUCTION

Opening comments on the PD were filed on February 4, 2008 by Park, the Utility Reform Network, the Latino Issues Forum, the National Consumer Law Center and Disability Rights Advocates ("Joint Consumers"), Consumer Federation of California ("CFC"), the Division of Ratepayer Advocates, California Water Service Company, and Suburban Water Systems. Park offers reply to the opening comments of CFC and the Joint Consumers.

II. REPLY TO CFC

CFC's comments on the PD consist almost entirely of rearguing positions taken in CFC's brief. According to Rule 14.3 (c), these comments should be accorded no weight. Even where CFC asserts that the PD violates section of the Public Utilities Code, CFC's assertions are based on these same arguments which CFC has made throughout this proceeding that; 1) only multi-tiered rate structures can be deemed conservation rates; 2) the proposed rate designs will not be effective in promoting conservation without more extreme differences between tiers; and 3) water companies should immediately adopt rate structures which districts or cities have developed gradually over years without going through the same transitional process and without regard to the effect on ratepayers. The PD has examined and rejected these arguments.

The pages of CFC's comments are not numbered. Park's replies, therefore, reference CFC's comments according to section number.

A. The PD Does Not Violate PU Code Section 453 or 701.10

In Section I of its comments, CFC states that the PD, at page 12, "sets a numerical goal for conservation and allows individual utilities to decide how to meet it". CFC then asserts that the PD would have the Commission cede its responsibility to examine rate applications and make a determination as to whether those rates meet statutory standards. CFC then cites as relevant statutes which it asserts are not met by the rates approved in the PD, PU Code sections 453 (c) and 710.10, (c) and (f).

The PD, at page 12, contains a discussion of the setting of conservation goals in Phase II of this proceeding and addresses CFC's concern about adopting rate designs prior to setting this goal. The PD states that it favors the broad approach because it will allow utilities to meet goals through price and non-price policies. Though the position taken in the PD does not agree with CFC's opinion that only extreme tiered rate designs will be effective in meeting conservation goals, there is nothing on page 12 of the PD which cedes the Commission's responsibility to examine rate applications and set rates which meet statutory standards. CFC's assertion that the PD cedes the Commission's responsibility is totally unfounded. CFC's assertion that the rates adopted in the PD for Park do not meet the standards of PU Code Sections 453 (c) and 710.10, (c) and (f) is equally unfounded.

1. PU Code Section 710.10, (c) and (f)

CFC asserts that the rates approved in the PD for Park do not provide appropriate incentives to customers to conserve water and are not based on the cost of providing water service, and therefore do not meet the requirements of PU Code Section 710.10, (c) and (f), respectively.

As shown in Park's Reply Brief on Issues in Phase 1A (Section II.A., pages 2-3), the rates approved in the PD for Park, both for residential and non-residential customers, are conservation rates which meet or exceed the criteria set forth by the CUWCC and are appropriate as the initial step of implementing conservation rates that will continue evolving over time. It is exactly the same initial step taken by LADWP when that agency first began this process.

As shown in Park's Reply Brief on Issues in Phase 1A (Section II.C., pages 4-7), the rates in Park's settlement are based on the cost of providing the water service; they are set so as to generate Park's adopted revenue requirement. The rates maintain the existing allocation of revenue from each customer class adopted in Park's most recent GRC decision. CFC's assertion that the proposed rates are not based on cost of service is based solely on CFC's opinion that additional cost allocation studies are required.

CFC further argues that the Commission has avoided unreasonable discrimination in the past by requiring cost allocation studies and cites D. 02-02-052. The cited decision has to do with the allocation of Aggregate DWR revenue requirement for long-term power contracts among the different California electric utilities. Park does not see anything in that decision that has any direct bearing on the necessity for additional cost allocation studies in this proceeding.

2. PU Code Section 453

CFC asserts that the rates approved in the PD are discriminatory and do not meet the standard of PU Code 453 (c). CFC's assertion that the rates are discriminatory appears to stem from the fact that the rate design for residential customers contains a 2-tier commodity rate while the rate design for the non-residential customer classes has a single tier commodity rate.

The rates proposed for Park in the settlement have the same schedule of service charges by meter size for all customer classes (Settlement Agreement Between DRA and Park on WRAM & Conservation Rate Design, page 5, para. 5.2). As the PD notes (page 23), the average effective commodity rate for the residential customers is the same as the single tier commodity rate for all other classes. The only difference is that the residential rates have two tiers.

CFC (Section I.A.1.) asserts that the tiered rates for residential customers have a discriminatory effect because residential customers will incur higher volumetric rates as usage increases in the second tier with the result that bills for residential customers have the potential to increase by a greater percentage than those for non-residential customers. This effect will only occur when a residential customer has usage that exceeds the standard indoor household usage of 10 Ccf/month (Park Reply Brief on Phase 1A Issues, Section II.D., page 8) by more than three times (Settlement Agreement Between DRA and Park on WRAM & Conservation Rate Design, Attachment 1, page 1). The fact that no such standard usage amount has been introduced for any customer class other than residential, illustrates the fundamental difference in homogeneity between the residential class and other customer classes.

CFC (second page of Section I.A.1.) asserts that "The ALJ erroneously determined that inter-class discrimination was justified in Park's case because 'non-residential customer classes in Park's service territory do not exhibit homogeneous usage patterns so developing increasing block rates for those classes will be more time-consuming.'" CFC claims that the usage of residential customers is not more homogeneous than that of non-residential customers and points to the fact that Suburban found reason for separate rates within its residential class and that LADWP has different rates for residential customers based on various factors including by climate zones. The fact that these other entities have found some heterogeneity within their residential customers does not refute the PD's finding that, for Park, the usage patterns of the non-residential customer classes are fundamentally less homogeneous than the usage pattern of residential customers. The PD's determination is not erroneous.

The fact that there is a difference between the residential and non-residential commodity rate structures does not, in and of itself, constitute discrimination or violate PU Code Section 453. PU Code section 453 (c), cited by CFC, actually states: “No public utility shall establish or maintain any unreasonable difference as to rates, charges, service, facilities, or in any other respect, either as between localities or as between classes of service.” (emphasis added). The PD has determined that the single difference between the rates proposed for Park’s residential customers and non-residential customers is reasonable. Further, PU Code 453 (e) states: “The commission may determine any question of fact arising under this section.”.

CFC argues that the PD is inconsistent, asserting “The ALJ rejected Cal Water’s non-residential rates to avoid discrimination. (see below) The ALJ should reject the Park Settlement for the same reason.” The “below” appears to be a reference to footnote 9 in Section I.B.3. in which CFC claims that “The ALJ apparently recognizes discrimination as a ground for rejecting rates since she refuses to accept the rate design for Cal Water’s non-residential customers, citing the PD at page 17-18. At the bottom of page 17 the PD, referring to the Cal Water settlement, states “The settling parties have not justified different single quantity rates by meter size and the resulting bill impact for average consumption.”. This issue in the Cal water settlement relates to impacts within a customer class rather than between customer classes and has to do with different single quantity rates by meter size which are not proposed for Park.

B. CFC’s Assertion that the PD Evidences Legal Error is Unfounded

In Section II of its comments, CFC argues that the PD commits legal error because the Commission has decided to address the pilot conservation rate proposals in Phase 1 of this proceeding and to address the expansion of tiered rate designs to other customer classes, and revision of the residential tiered rate designs in future GRCs (Assigned Commissioner’s Ruling and Phase 2 scoping Memo – February 8, 2008, page 2), because the PD found the issue of additional cost allocation studies to be outside the scope of the proceeding, and because CFC perceives that it was “confronted with a brick wall” in attempting to offer evidence to rebut settlement proposals.

CFC has consistently opposed the idea of pilot programs and any transitional approach to implementing conservation rates. CFC takes the position that the implementation of conservation rates should be delayed until the perfect rate structure can be developed, which rate structure would never have to be changed (Park Reply Brief, page 6). CFC’s position has been that, as a first step, utilities should implement rate designs similar to those developed over years by a relatively small number of municipalities and districts, without going through that same development process to allow customers to acclimate to the conservation rates and provide for customization of the conservation rate design based on actual experience (Park Reply Brief, page 7). The fact that the PD does not agree with CFC’s position does not constitute legal error.

The issue of additional cost allocation studies is not an issue that was raised in the OII. CFC’s assertions that it must be addressed to comply with the PU Code are addressed above.

The evidence CFC presented to rebut the settlement proposals consisted largely of pointing to existing conservation rate designs for a small number of districts and municipalities, offering examples of various alternative types of conservation rate designs which were sometimes mutually exclusive, and CFC’s unsupported contention that the proposed rate designs would be ineffective unless all customer classes had tiered rates with large rate differentials between tiers. CFC did not appear to give any consideration to the customer impact of such recommendations. CFC did not provide any alternate rate schedules for the Commission’s consideration which generated Park’s adopted revenue requirement and would, in fact be based on cost of service and meet the standard of PU Code Section 710.10, (f). The fact that the PD did not find CFC’s evidence to be convincing, and did

not agree with CFC's recommendations, does not mean that the settling parties did not meet the appropriate burden of proof for the reasonableness of the settlements. It does not mean that CFC was deprived of due process. And it does not constitute legal error.

III. REPLY TO JOINT CONSUMERS

A. Joint Consumer's Contention that the PD's Approval of the Park/DRA Settlement Agreement runs Counter to the Public Interest and is not Reasonable in Light of the Record of this Proceeding is Incorrect

The joint opening comments of the Utility Reform Network, Latino Issues Forum, National Consumer Law Center and Disability Rights Advocates (the "Joint Consumers") assert that the PD is reliant upon promises from Park to implement meaningful customer education on the proposed conservation rate design. The Joint Consumers (page 9) state, "As discussed above, the Proposed Decision relies on promises from the utilities to implement consumer education measures. But these promises, in addition to be unenforceable, do not go far enough to protect low income and limited English Speaking customers." This assertion has little basis in the record of this proceeding. As referenced in the Joint Consumer's opening comments (page 7), the Park/DRA Settlement Agreement dated June 15, 2007 (the "Settlement") addresses customer education and outreach. The Settlement (Section 11, page 7) states the following:

11.1 Park will develop a customer education and outreach program associated with implementing the new conservation rate design. Park will include notices in English, Spanish, and in other languages prominently used by Park's customers. Park will make conservation rate information available on its website in the same languages. Park agrees to use accessible means of communication to meet the needs of hearing and/or vision impaired customers. Park agrees to meet with disability rights advocates to determine the best way to make this information accessible to customers with disabilities.

11.2 Park will provide a notice to Community Based Organization (including organizations representing the interests of persons with disabilities) within its service areas so that they can publicize the conservation rate design.

Contrary to the Joint Consumer's assertion of vague promises, the Settlement contains tangible actions that Park has committed to that are both verifiable and enforceable by the Commission.

Additionally, the record of this proceeding contains testimony that Park presented in response to the comments of the Joint Consumers on the Park/DRA Settlement Agreement. In its testimony (Further Testimony of Edward Jackson, pages 3- 4), Park clarified its positions with respect to the recommendations of the Joint Consumers on customer education and outreach. Park has committed to the following specific actions: providing large type notices upon request, contacting the community based organizations ("CBO") in its service territory and to enter in partnerships with those CBO's willing to do so, continue the existing practice of providing a toll-free number for non-English speaking customers with bilingual customer service representatives available for Spanish-speaking customers, and provide TTY access to information. Contrary to Joint Consumer's assertion of vague and general promises, the testimony provided by Park in this proceeding contains substantive measures to provide meaningful customer education and outreach to its customers that are verifiable by the Commission.

The record of this proceeding clearly supports the adoption of the Park/DRA settlement. The fact that Park's proposed customer education and outreach program is not the subject of a separate settlement agreement or memorandum of understanding with the Joint Consumers does not make Park's customer education and outreach program any less concrete.

B. Joint Consumer's Recommendation that the PD Require Additional Notice and Outreach for Spanish-Speaking and Disabled Customers is Unnecessary

The Joint Consumers assert that the PD does not adequately justify its refusal to adopt sufficient customer education and outreach measures for Park. As support for this assertion, the Joint Consumers (page 6) express concern over Park's rejection of

two of its specific recommendations. The Joint Consumers state that Park has not agreed to provide public notification for Spanish-speaking customers in the form of a newspaper advertisement or home-delivered flyers targeted to Spanish-speaking populations. These comments ignore the direct testimony provided by Park in this proceeding which demonstrates that these specific recommendations are unnecessary and inappropriate for Park.

As shown above, all of Park's communication methods include Spanish-language capability: notices, IVR phone system, and customer service representatives. (Park Reply Brief on Phase 1A Issues, Sections IV.C. and IV.D., pages 20-23).

Park's objection to providing advertisement in newspaper publications, in English or Spanish, is based on cost effectiveness; Park considers that newspaper publications are not a cost effective means of communicating with its customers. Providing a separate additional notice targeted only at Spanish-speaking customers is redundant to Park's existing practice and would therefore also not be cost-effective. The Commission's Rules of Practice and Procedure require the use of newspaper publication H(Rule 3.2) only for notice of general rate increase applications and notice of evidentiary hearings (Rule 13.1). Customer notices by newspaper are not required to target specific customer groups or for any other purpose (Park Reply Brief on Phase 1A Issues, Sections IV.D., page 22 and IV.G., page 24).

The Joint Consumers (page 9) further state, "Perhaps the specific method of outreach could be decided by the utility, at the district level, but there must be a Commission requirement that there be *additional* notice and outreach for Spanish-speaking and disabled customers." Due to the above stated efforts that Park has undertaken in order to serve its Spanish-speaking and disabled customers, additional measures are not required. While Park agrees to TTY access and communications in large type as additional measures for disabled customers, the Joint Consumers have not provided any basis for its recommended Commission requirement for some additional method of outreach targeting specific language groups beyond insuring that the communications provided for all customers are provided in that language.

The record in this proceeding contains the details of Park's customer education and outreach program that is both meaningful and cost effective. There is no need for greater specificity or the imposition of additional requirements as proposed by the Joint Consumers.

IV. CONCLUSION

For all the reasons presented above, Park respectfully urges the Commission to disregard the proposals of CFC and the Joint Consumers addressed in these comments.

Respectfully submitted,

/s/ LEIGH K. JORDAN
LEIGH K. JORDAN
PARK WATER COMPANY

Executive Vice President
9750 Washburn Road
Downey, CA 90241
Phone: (562) 923-0711
Fax: (562) 861-5902
leigh@parkwater.com

Dated: February 11, 2008

*****CERTIFICATE OF SERVICE*****

**I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A COPY OF “REPLY
COMMENTS OF PARK WATER COMPANY ON
PROPOSED DECISION PHASE 1A” IN I.07-01-022 BY USING THE
FOLLOWING SERVICE:**

☒ **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

☒ **U.S. Mail Service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses, if any.

Executed on February 11, 2008, at Downey, California.

/s/ EDWARD N. JACKSON
Edward N. Jackson

*****SERVICE LIST*****
**REPLY COMMENTS OF PARK WATER COMPANY ON
PROPOSED DECISION PHASE 1A**

Last Update on January 25, 2008

I.07-01-022

Appearance

CHARLIE HARAK
NATIONAL CONSUMER LAW CENTER
ATTORNEY AT LAW
3000 K STREET, N.W. SUITE 300
BOSTON, MA 02110-1006
charak@nclc.org

JEAN L. KIDDOO
77 SUMMER STREET, 10TH FLOOR
BINGHAM MCCUTCHEN LLP
WASHINGTON, DC 20007
kikiddoo@swidlaw.com

NANCI TRAN
GOLDEN STATE WATER
630 E. FOOTHILL BOULEVARD
SAN DIMAS, CA 91773-9016
nancitrان@gswater.com

OLIVIA B. WEIN
3000 K STREET, NW, SUITE 300
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE., NW., STE. 510
WASHINGTON, DC 20036
owein@nclcdc.org

FRED G. YANNEY
FULBRIGHT & JAWORSKI LLP
555 SOUTH FLOWER STREET, 41ST FLOOR
LOS ANGELES, CA 90017-2571
fyanney@fulbright.com

EDWARD N. JACKSON
PARK WATER COMPANY
DIRECTOR REVENUE REQUIREMENTS
9750 WASHBURN ROAD
DOWNEY, CA 90241-7002
ed@parkwater.com

ROBERT J. DIPRIMIO
VALENCIA WATER COMPANY
24631 AVENUE ROCKEFELLER
VALENCIA, CA 91355
rdiprimio@valencia.com

ROBERT KELLY
SUBURBAN WATER SYSTEMS
1211 EAST CENTER COURT DRIVE
COVINA, CA 91724-3603
bobkelly@bobkelly.com

MICHAEL L. WHITEHEAD
SAN GABRIEL VALLEY WATER CO.
PO BOX 6010
EL MONTE, CA 91734
mlwhitehead@sgvwater.com

KEITH SWITZER
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
kswitzer@gswater.com

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELEC
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
rkmoore@gswater.com

LEIGH K. JORDAN
EXECUTIVE VICE PRESIDENT
APPLE VALLEY RANCHOS/PARK WATER CO
21760 OTTAWA ROAD
APPLE VALLEY, CA 92307
leigh@parkwater.com

KENDALL H. MACVEY
ATTORNEY AT LAW
BEST, BEST & KRIEGER, LLP
PO BOX 1028
RIVERSIDE, CA 92502
kendall.macvey@bbklaw.com

CHRISTINE MAILLOUX
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
cmailloux@turn.org

JACK HAWKS
CALIFORNIA WATER ASSOCIATION
601 VAN NESS AVE., SUITE 2047
SAN FRANCISCO, CA 94102
jhawks_cwa@comcast.net

NINA SUETAKE
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE 350
SAN FRANCISCO, CA 94102
nsuetake@turn.org

DANIEL A. DELL'OSA
SAN GABRIEL VALLEY WATER COMPANY
11142 GARVEY AVENUE, PO BOX 6010
EL MONTE, CA 91733
dadellosa@sgvwater.com

TIMOTHY J. RYAN
ATTORNEY AT LAW
SAN GABRIEL WATER COMPANY
11142 GARVEY AVENUE
EL MONTE, CA 91733
tjryan@sgvwater.com

MARCELO POIRIER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION, ROOM 5025
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
mpo@cpuc.ca.gov

DAVID A. EBERSHOFF
ATTORNEY AT LAW
FULBRIGHT & JAWORSKI, L.L.P.
555 SO. FLOWER STREET, 41ST FLOOR
LOS ANGELES, CA 90017
debershoff@fulbright.com

MONICA L. MCCRARY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION, ROOM 5134
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
mlm@cpuc.ca.gov

NATALIE WALES
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION, ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
ndw@cpuc.ca.gov

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111
enriqueg@lif.org

LENARD G. WEISS
ATTORNEY AT LAW
STEEFEL, LEVITT & WEISS, PC
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111
lweiss@steeffel.com

LORI ANNE DOLQUEIST
STEEFEL, LEVITT & WEISS
ATTORNEY AT LAW
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111
ldolqueist@steeffel.com

SARAH E. LEEPER
STEEFEL, LEVITT & WEISS
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111-3719
sleeper@steeffel.com

B. TILDEN KIM
ATTORNEY AT LAW
RAICHARS WATSON & GERSHON
355 SOUTH GRAND AVENUE, 40TH FLOOR
LOS ANGELES, CA 90071
tkim@rwglaw.com

ALLYSON TAKETA
ATTORNEY AT LAW
FULBRIGHT & JAWORSKI, L.L.P.
550 SOUTH FLOWER STREET, 41ST FLOOR
LOS ANGELES, CA 90071
ataketa@fulbright.com

FRANCIS S. FERRARO
CALIFORNIA WATER SERVICE COMPANY
1720 NORTH FIRST STREET
SAN JOSE, CA 95112
sferraro@calwater.com

LYNNE P. MCGHEE
ATTORNEY AT LAW
CALIFORNIA WATER SERVICE COMPANY
1720 NORTH FIRST STREET
SAN JOSE, CA 95112
lmcghee@calwater.com

BETTY R. ROEDER, PRESIDENT
GREAT OAKS WATER COMPANY
15 GREAT OAKS BLVD., SUITE 100
SAN JOSE, CA 95196
broeder@greatoakswater.com

PALLE JENSEN
SAN JOSE WATER COMPANY
374 WEST SANTA CLARA ST.
SAN JOSE, CA 95119
palle_jensen@sjwater.com

DAVID MORSE
CALIFORNIA WATER SERVICE COMPANY
1411 W. COVELL BOULEVARD, SUITE 106-292
DAVIS, CA 95616-5934
demorse@omsoft.com

JOSE E. GUZMAN
ATTORNEY AT LAW
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111
jguzman@nossaman.com

ALEXIS K. WODTKE
STAFF ATTORNEY
CONSUMER FEDEERATION OF CALIFORNIA
520 S. EL CAMINO REAL, SUITE 340
SAN MATEO, CA 94402
lex@consumercal.org

JEFFREY NAHIGIAN
JBS ENERGY, INC.
311 D. STREET
WEST SACRAMENTO, CA 95605
jeff@jbsenergy.com

LISA BURGER
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, 3RD FLOOR
BERKELEY, CA 94704
pucservice@dralegal.org

MELISSA W. KASNITZ
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, 3RD FLOOR
BERKELEY, CA 94704
pucservice@dralegal.org

MARTIN A. MATTES
ATTORNEY AT LAW
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111
mmattes@nossaman.com

DARLENE M. CLARK, ESQ.
CALIFORNIA AMERICAN WATER
4701 BELOIT DRIVE
SACRAMENTO, CA 95838-2434
darlene.clark@amwater.com

DAVID P. STEPHENSON
CALIFORNIA-AMERICAN WATER COMPANY
4701 BELOIT DRIVE
SACRAMENTO, CA 94838
dstephen@amwater.com

PATRICIA A. SCHMIEGE
ATTORNEY AT LAW
LAW OFFICE OF PATRICIA A. SCHMIEGE
705 MISSION AVENUE, SUITE 200
SAN RAFAEL, CA 94901
pschmiege@schmiegelaw.com

BILL MARCUS
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605
bill@jbsenergy.com

MARCEL HAWIGER
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
marcel@turn.org

Information Only

JOHN GREIVE
LIGHTYEAR NETWORK SOLUTIONS, LLC
1901 EASTPOINT PARKWAY
LOUISVILLE, KY 40223
john.greive@lightyear.net

MARY CEGELSKI
FIRST COMMUNICATIONS, LLC
15166 NEO PARKWAY
GARFIELD HEIGHTS, OH 44128
mcegelski@firstcomm.com

CHARLES FORST
360 NETWORKS (USA) INC.
867 COAL CREEK CIRCLE/SUITE 160
LOUISVILLE, KY 40223
charles.forst@360.net

DEBBIE DAVIS
LEGISLATIVE ANALYST
ENVIRONMENTAL JUSTICE COALITION FOR WATER
654 13TH STREET
PRESERVATION PARK, CA 94612
debbie@ejcw.org

WILLIAM F. DIETRICH
ATTORNEY AT LAW
DIETRICH LAW
2977 YGNACIO VALLEY ROAD, 613
WALNUT CREEK, CA 94598-3535
dietrichlaw2@earthlink.net

THOMAS F. SMEGAL
MANAGER OF RATES
CALIFORNIA WATER SERVICE COMPANY
1720 NORTH FIRST STREET
SAN JOSE, CA 95112
tsmegal@calwater.com

TIMOTHY S. GUSTER
GENERAL COUNSEL
GREAT OAKS WATER COMPANY
P.O. BOX 23490
SAN JOSE, CA 95153
tguster@greatoakswater.com

ADRIAN HANSON
1231 FORRESTVILLE AVENUE
SAN JOSE, CA 95510

DONALD R. WARD
ATTORNEY AT LAW
4689 MARLENE DRIVE
SANTA MARIA, CA 93455
luhintz2@verizon.net

DOUGLAS K. MARTINET
PARK WATER COMPANY INC.
P.O. BOX 7002
DOWNEY, CA 90241
dougmp@parkwater.com

KATIE SHULTE JOUNG
CALIFORNIA URBAN WATER CONSERVATION
455 CAPITOL MALL, SUITE 703
SACRAMENTO, CA 95814
katie@cuwcc.org

MATT VANDER SLUIS
PLANNING AND CONSERVATION LEAGUE
1107 9TH STREET, SUITE 360
SACRAMENTO, CA 95814
mvander@pcl.org

DANIELLE C. BURT
BINGHAM MCCUTCHEN LLP
3000 K STREET, NW
SUITE 300
WASHINGTON, D.C. 20007-5116
danielll.burt@bingham.com

CHRIS BROWN
EXECUTIVE DIRECTOR
CALIFORNIA URBAN WATER CONSERVATION
455 CAPITOL MALL, SUITE 703
SACRAMENTO, CA 95814
chris@cuwcc.org

ROBERT A. LOEHR
ATTORNEY AT LAW
GREAT OAKS WATER COMPANY
15 GREAT OAKS BOULEVARD
SUITE 100
SAN JOSE, CA 95119
bloehr@greatoakswater.com

State Service

JOYCE STEINGASS
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH, ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
jws@cpuc.ca.gov

LISA WALLING
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH
ROOM 4208
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
lwa@cpuc.ca.gov

BERTRAM D. PATRICK
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVENUE, ROOM 5110
SAN FRANCISCO, CA 94102-3214
bdp@cpuc.ca.gov

FRED L. CURRY
CALIF PUBLIC UTILITIES COMMISSION
WATER ADVISORY BRANCH
505 VAN NESS AVENUE, ROOM 3106
SAN FRANCISCO, CA 94102-3214
flc@cpuc.ca.gov

JAEYEON PARK
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
jcp@cpuc.ca.gov

LAURA L. KRANNAWITTER
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
llk@cpuc.ca.gov

DIANA BROOKS
CALIFORNIA PUBLIC UTILITIES
COMMISSION
WATER BRANCH
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
dsb@cpuc.ca.gov

EDWARD HOWARD
CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
trh@cpuc.ca.gov

PATRICK HOGLUND
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH, ROOM 3200
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94103-3214
phh@cpuc.ca.gov

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
505 VAN NESS AVENUE, AREA 3-C
SAN FRANCISCO, CA 94102-3214
smw@cpuc.ca.gov

TATIANA OLEA
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH, ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
tfo@cpuc.ca.gov

JANICE L. GRAU
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVENUE, ROOM 5011
SAN FRANCISCO, CA 94102-3214
jlgr@cpuc.ca.gov